



February 19, 2025

The Honorable Judge Theodore D. Chuang
District Judge
U.S. District Court for the District of Maryland
6500 Cherrywood Lane, Suite 245
Greenbelt, MD 20770

Re: *J. Does 1-26 v. Musk and DOGE*, No. TDC-25-0462

Dear Judge Chuang,

We write to bring important information to Your Honor's attention. At 12:34 a.m. EST this morning, hundreds of personal services contractors (PSCs), *including some of the plaintiffs in this lawsuit*, were sent a mass termination letter.¹ More letters are being sent by the hour.

The mass termination letter was sent without any warning to PSCs or other staff. It was sent to some PSCs who regained access to USAID systems after the issuance of Temporary Restraining Orders in *American Foreign Service Association v. Trump*, No. 25-352 (D.D.C. 2025) and *AIDS Vaccine Advocacy Coalition v. U.S. Department of State*, No. 1:25-cv-00400 (D.D.C. 2025) and *Global Health Council v. Trump*, No. 1:25-cv-00402 (D.D.C. 2025), and to some PSCs who still had not obtained access, including J. Does whose situations are highlighted in plaintiffs' motion for preliminary injunction.

Moreover, the letter came directly after we shared with the government our draft motion for temporary restraining order² and subsequently filed plaintiffs' motion for preliminary injunction specifically requesting relief for PSCs.³ We can conclude only that this action is in retaliation for

¹ Attached as Exhibit 1.

² See Email from Mimi Marziani, Pls. Counsel, to Christopher Hall, Dep't of Justice, Re: TDC-25-0462 Does 1-26 v Musk, *et al.*, (Feb. 18, 2025, 11:48AM EST) on file with the author (attaching draft memorandum in support of what Plaintiffs originally envisioned to be a forthcoming temporary restraining order, noting it was not yet filed and asking him not to distribute the draft).

³ Indeed, as evidence of the government responding specifically to the draft motion for temporary restraining order, just four hours after we shared the draft with opposing counsel, the government sent out an email to some USAID staff providing a short window of time to retrieve

PSCs seeking to vindicate their legal rights. Firing several of the plaintiffs when they have been without access to USAID systems necessary to protect their safety directly contradicts government counsel's repeated representations during yesterday's case management conference that the defendants would work in good faith to restore Plaintiffs' access.

We will update the Court with any additional information as the situation develops, including possibly moving for emergency relief if necessary to ensure the safety of retaliated-against PSCs, especially those overseas, and possibly seeking expedited discovery focused on this cynical action, to the extent the government will not provide such information through voluntary discovery.

Respectfully submitted,

/s/ Norman L. Eisen

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**Application for admission pro hac vice pending.

their personal belongings from USAID buildings. The withholding of those personal belongings is a specific harm highlighted in the motion.